

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,  
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,  
et al.,

Defendants.

Case No. 4:10-cv-00189-ODS

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that Plaintiffs in this civil action will pursuant to the parties' agreement take the deposition of A. Randall Appleyard pursuant to Federal Rules of Civil Procedure at the offices of **Polsinelli Shughart P.C., 805 Third Avenue, Suite 2020, New York, New York 10022 on August 14, 2012.**

The deposition will begin at 9:00 a.m. and shall continue thereafter from day to day until concluded. The deposition will be recorded by stenographic means. A list of the documents and tangible things that that Mr. Appleyard is requested to produce at the deposition is attached.

Dated: August 2, 2012

Respectfully submitted,

WALTERS BENDER STROHBEHN  
& VAUGHAN, P.C.

By: /s/ Garrett M. Hodes

R. Frederick Walters – Mo. Bar 25069  
Kip D. Richards – Mo. Bar 39743  
David M. Skeens – Mo. Bar 35728  
Karen W. Renwick – Mo. Bar 41271  
J. Michael Vaughan Mo. – Bar 24989  
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**ATTORNEYS FOR PLAINTIFFS  
AND CLASS COUNSEL**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this the 2<sup>nd</sup> day of August 2012, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants. In addition, a copy was served by U.S. mail, First-Class Postage Prepaid, to:

Arthur E. Kechijian, Manager  
United Mortgage C.B., LLC  
P.O. Box 471827  
Charlotte, NC 28247  
**Defendant United Mortgage C.B., L.L.C.**

/s/ Garrett M. Hodes

## **DOCUMENTS TO PRODUCE**

1. Your file(s) for this matter, and to the extent not included within your file(s), the following documents and tangible things:
  - a. Your invoices/bills and time sheets or other documents that itemize and/or describe your work in this matter.
  - b. Your copies of the “documents considered” that you stated you reviewed including, without limitation, the *original copies* of the declarations and reports that you identified in your report. (Please produce *your copies* without removing or redacting any notations, comments, highlights, post-it notes, etc.)
  - c. Any summaries, narratives, pleadings, discovery responses, and other documents and tangible things provided to you by the defendants or their attorneys.
  - d. Your notes, journals, logs, and other documents reflecting any observations, or work made and/or performed by you in this case.
  - e. Any notes and/or recordings made of any conversations that you have had with any person or business in connection with this matter.
  - f. Any correspondence (including faxes, e-mail and wireless correspondence) sent, received and/or generated in connection with this case.
  - g. Any documents or tangible things on which you base your opinions in this case.
  - h. Copies of any standards, guidelines or regulations on which you base your opinions.
  - i. Any documents or tangible things that you considered, consulted or reviewed in connection with this deposition or case, but on which you do not base any of your opinions.